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Executive Director-
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July 16, 2003

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Room TWB-204
Washington, D.C. 20554

Erratum

Re: CC Docket Nos. 96-149 and 98-141, Petition of SBC for Forbearance From the Prohibition of Sharing Operating, Installation and Maintenance Functions Under Sections 53.203(a)(2) and 53.203(a)(3) of the Commission's Rules and Modification of Operating, Installation and Maintenance Conditions Contained in the SBC/Ameritech Merger Order

Notice of Ex-Parte Communication

Dear Ms. Dortch:

Enclosed please find a corrected copy of SBC's Notice of Ex-Parte Communication filed in the above referenced docket. The attached is being filed to include the attachment which was inadvertently excluded from the original notice submitted via electronic filing on July 15, 2003.

Please accept my apology for any inconvenience. Should you have any questions regarding the attached, please do not hesitate to contact me by whatever means are most convenient for you.


Jacquelyne Flemming

Attachment

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Executive Director-
Federal Regulatory

SBC Telecommunications, Inc.
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Secretary
Federal Communications Commission
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Re: CC Docket Nos. 96-149 and 98-141, Petition of SBC for Forbearance From the Prohibition of Sharing Operating, Installation and Maintenance Functions Under Sections 53.203(a)(2) and 53.203(a)(3) of the Commission's Rules and Modification of Operating, Installation and Maintenance Conditions Contained in the SBC/Ameritech Merger Order

Notice of Ex-Parte Communication

Dear Ms. Dortch:

On Tuesday, July 15, 2003, James Smith, Gary Phillips, Keith Epstein, and Richard Dietz of SBC Communications Inc. met with William Dever, Michelle Carey and Christi Shewman of the Wireline Competition Bureau's Competitive Policy Division. The purpose of this meeting was to discuss relief requested by SBC in the above-referenced proceeding. The attached document were provided to the FCC staff at the meeting.

In accordance with section 1.1206 of the Commission's rules, this letter is being filed in the above-referenced proceeding via the Commission's ECFS system. Should you have any questions regarding the attached, please do not hesitate to contact me by whatever means are most convenient for you.

/s/ Jacquelyne Flemming

Attachment

OI&M Forbearance Petition

**Sharing OI&M among SBC data affiliates
will create operational efficiencies that
benefit the consumer and competition**

July 14, 2003

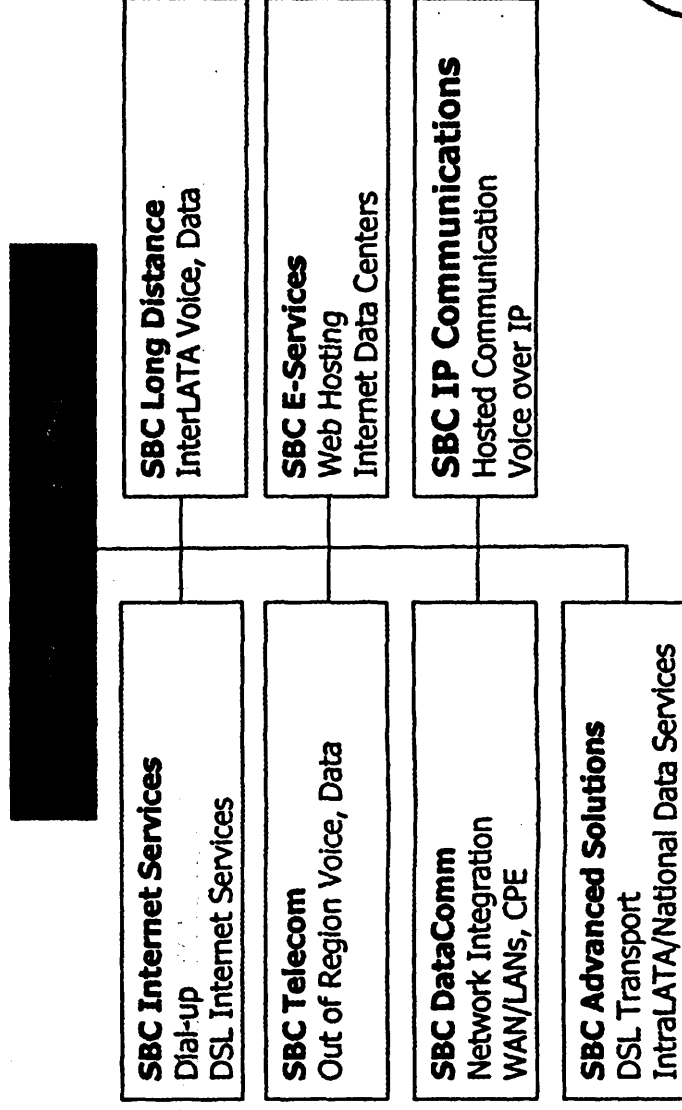


**Richard Dietz
President & CEO
SBC Data Services**

Customers Need Seamless End-to-End Data Management by One Company

However, regulations caused SBC to establish separate data affiliates that operate independently to provide an end-to-end data service.

Currently, data services are provided by the following SBC Data Services affiliates:



The OI&M regulations create operational inefficiencies, compromise the customer experience, and hinder competition

OI&M Restrictions Prevent Customers from Receiving Seamless End-to-End Managed Services

Can SBC Data Affiliates Perform OI&M Functions		
<i>Affiliate</i>	for ASI	for Long Distance
ASI	N/A	No
Long Distance	No	N/A
Internet Services	No	No
Telecom	No	No
DataComm	No	No

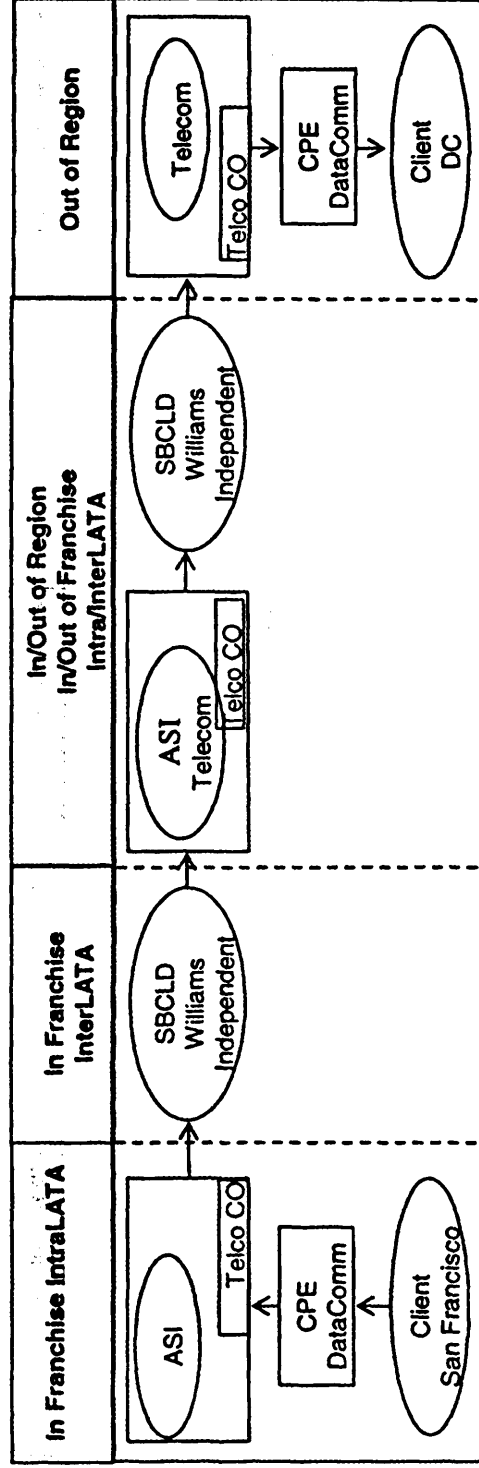
*Forbearance would allow SBC Data Services to provide
customers with end-to-end managed services and
encourage competition*



Forbearance Will Allow SBC Data Services to Provide End-to-End Managed Service to the Customer

However, under the current structure, providing end-to-end managed services for one customer requesting interLATA ATM/Frame relay services requires:

- 5 separate affiliate orders
- 5 handoffs among affiliates
- 4 affiliate systems updated with duplicate network information
- 3 separate affiliate project managers with identical skill sets
- 5 separate affiliate billing systems



OI&M regulations create redundancies and increase inefficiencies among the SBC Data Service affiliates for sales, ordering, provisioning, installation, maintenance, surveillance, billing, and customer care



Inefficiencies Create a \$77.8 Million Annual Burden

Redundant OI&M services create inefficiencies that are a burden to SBC data operations and make it difficult to meet customer needs.

The annual \$77.8 million savings associated with OI&M duplicative efforts demonstrates the extent of the inefficiencies that burden SBC and degrade the customer experience.

Savings would be achieved in the following areas:

- ▶ Surveillance and Monitoring
- ▶ Network Capacity Management
- ▶ Local Field Operations and Dispatch
- ▶ Ordering, Circuit Design and Facility Assignment
- ▶ Performance Metrics, Customer Service/Complaint Group
- ▶ Staff Product Support
- ▶ Real Estate
- ▶ Program/Project Management
- ▶ Provisioning, Installation, Maintenance and Repair



ATM/Frame Relay Service

(Example of an end-to-end managed service network)

